

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA : CRIMINAL NO. 22-
v. : VIOLATION:
SAMIRAH BOKSMATI : 18 U.S.C. § 1542 (false statement in a
passport application - 4 counts)
: 18 U.S.C. § 1542 (use of a passport
secured by false statement – 3 counts)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about March 24, 2022, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

SAMIRAH BOKSMATI

willfully and knowingly made a false statement in an application for a passport with intent to induce and secure for her own use the issuance of a passport under the authority of the United States, contrary to the laws regulating the issuance of such passports and the rules prescribed pursuant to such laws, that is, defendant Boksmati stated that her passport was lost or stolen, when in fact, as defendant Boksmati knew, this statement was false in that her passport was in the custody of the Butler County Prothonotary pursuant to court orders.

In violation of Title 18, United States Code, Section 1542.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 24, 2022, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

SAMIRAH BOKSMATI

willfully and knowingly made a false statement in an application for a passport with intent to induce and secure for L.B.'s use the issuance of a passport under the authority of the United States, contrary to the laws regulating the issuance of such passports and the rules prescribed pursuant to such laws, that is, defendant Boksmati stated that L.B.'s passport was lost or stolen, when in fact, as defendant Boksmati knew, this statement was false in that L.B.'s passport was in the custody of the Butler County Prothonotary pursuant to court orders.

In violation of Title 18, United States Code, Section 1542.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 24, 2022, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

SAMIRAH BOKSMATI

willfully and knowingly made a false statement in an application for a passport with intent to induce and secure for F.B.'s use the issuance of a passport under the authority of the United States, contrary to the laws regulating the issuance of such passports and the rules prescribed pursuant to such laws, that is, defendant Boksmati stated that F.B.'s passport was lost or stolen, when in fact, as defendant Boksmati knew, this statement was false in that F.B.'s passport was in the custody of the Butler County Prothonotary pursuant to court orders.

In violation of Title 18, United States Code, Section 1542.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 24, 2022, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

SAMIRAH BOKSMATI

willfully and knowingly made a false statement in an application for a passport with intent to induce and secure for N.B.'s use the issuance of a passport under the authority of the United States, contrary to the laws regulating the issuance of such passports and the rules prescribed pursuant to such laws, that is, defendant Boksmati stated that N.B.'s passport was lost or stolen, when in fact, as defendant Boksmati knew, this statement was false in that N.B.'s passport was in the custody of the Butler County Prothonotary pursuant to court orders.

In violation of Title 18, United States Code, Section 1542.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 19, 2022, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

SAMIRAH BOKSMATI

willfully and knowingly used Passport No. A00980209, issued under the authority of the United States, the issuance of which was secured by a false statement made in the application therefor in which defendant Boksmati stated that her passport was lost or stolen, when in fact, as defendant Boksmati knew, this statement was false in that her passport was in the custody of the Butler County Prothonotary pursuant to court orders, which said passport defendant Boksmati used to gain entry into the United States.

In violation of Title 18, United States Code, Section 1542.

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 19, 2022, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

SAMIRAH BOKSMATI

willfully and knowingly furnished to F.B. Passport No. A00980208, issued under the authority of the United States, the issuance of which was secured by a false statement made in the application therefor in which defendant Boksmati stated that F.B.'s passport was lost or stolen, when in fact, as defendant Boksmati knew, this statement was false in that F.B.'s passport was in the custody of the Butler County Prothonotary pursuant to court orders, which said passport defendant Boksmati furnished to F.B. for use to gain entry into the United States.

In violation of Title 18, United States Code, Section 1542.

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

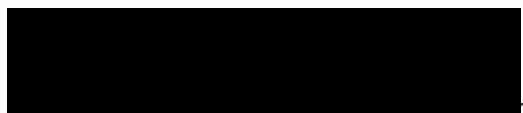
On or about August 19, 2022, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

SAMIRAH BOKSMATI

willfully and knowingly furnished to N.B. Passport No. A00980207, issued under the authority of the United States, the issuance of which was secured by a false statement made in the application therefor in which defendant Boksmati stated that N.B.'s passport was lost or stolen, when in fact, as defendant Boksmati knew, this statement was false in that N.B.'s passport was in the custody of the Butler County Prothonotary pursuant to court orders, which said passport defendant Boksmati furnished to F.B. for use to gain entry into the United States.

In violation of Title 18, United States Code, Section 1542.

A TRUE BILL:



FOREPERSON

A handwritten signature in black ink, appearing to read "JACQUELINE C. ROMERO".

JACQUELINE C. ROMERO
United States Attorney

No. _____

UNITED STATES DISTRICT COURT

Eastern District of Pennsylvania

Criminal Division

THE UNITED STATES OF AMERICA

vs.

SAMIRAH BOKSMATI

INDICTMENT

Counts

**18 U.S.C. § 1542 (false statement in a passport application – 4 counts)
18 U.S.C. § 1542 (use of a passport secured by false statement – 3 counts)**

A true bill.

[REDACTED]

Foreman

Filed in open court this 15th day,
Of September A.D. 20 22

Clerk

Bail, \$ _____